subsequent to the service of Complainant's response to these data requests, please provide such document or information as part of a supplemental response hereto.

- J) Please respond to all data requested by December 29, 2000.
- K) As used in the data requests, the term "document" includes all materials subject to discovery pursuant to III.S.Ct.Rul. 214 (adopted by the Commission at 83 III.Adm.Code §200.360(c), including the original and non-identical copies and drafts e.g., copies with notes, editing marks, modifications, additions, or deletions) of all recorded or graphic matter, whatsoever, whether in written or electronic form.
- L) For all other terms in this data request, please use the definitions contained in the Public Utilities Act (the "Act"), or if not defined therein please use the plain and ordinary meaning of the term.

DATA REQUESTS

These questions relate to the following representations you have made in connection with payments Peoples Gas has not credited to your account. Specifically, on November 13, 2000, following the status hearing for your complaint, you met with me in my office and provided me several documents related to your complaint. One titled DARVA K. WATKINS, 2436 S. Giles Avenue, Account #276509-04715 is attached as Exhibit A. It is the copy of a history of your account that Peoples Gas forwarded you with a letter from our Ms. C. Roebuck dated January 13, 1999. The 6th column, titled Payment, shows a record of every payment applied to your account at 3436 S. Giles after it was turned on 4/10/97. You also provided me a hand written letter you signed, dated February 13, 2000, addressed to the Illinois Comm. Comm. Attention Mr. Dosead that is attached as Exhibit B. In that letter on page 2 you allege both you and LIHEAP paid \$600 each to Peoples Gas after your service was disconnected on September 16, 1997 for non-payment. You further state that when the gas service was restored on October 21, 1997 that your balance was paid in full.

 Have you made any payments to Peoples Gas in addition to those shown in the column titled Payment of the attached Exhibit A? YES, I PAID ₱100.00 0N 03-19-99

2. If you have made additional payments not indicated on Exhibit A, please list the payment date, payment amount, how you paid (for instance by check, cash or credit card) and the method of payment (for instance mail, at a currency exchange, at a Peoples Castoff Corporates Gas agent). #500 ON 03-19-09

I.C.C. DOCKET NO OO -0678

Pesp Exhibit No. 6

Witness ______

Date 2-1-01 Reporter _____

3. For any payment you include in response to question 2, please provide evidence of your payment. Evidence would include a receipt, stamped payment stub, credit card statement or receipt, or a cancelled check. (INCLUDED)

Respectfully submitted,

Timothy P. Walsh An Attorney for

The Peoples Gas Light and Coke Company

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Dated this 1st day of December, 2000, at Chicago, Illinois

PEOPLES GAS

CHICAGO, ILLINOIS 60687-0001

BILLING INQUIRIES AND

SERVICE REQUESTS (312) 240-7000 PAYMENT RECEIPT

FORM 1155 5-1-97 CUSTOMER

NAME:

DARVA K-WATKINS

SERVICE

ADDRESS:

504#1 TZ HTOP 3 POP

ACCOUNT

NUMBER:

904358-00715

ISSUED

BY:

GSE

03/19/99

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